

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 2:24-cr-00124

LORI BUTTS,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
DEADLINE TO FILE MOTIONS**

Defendant Lori Butts, by her counsel, Nicole M. Masnica of Gimbel, Reilly, Guerin & Brown LLP, hereby moves the Court for a modification of the text only order entered on November 22, 2024, to file pre-trial motions, extending the defendant's deadline by three weeks to February 7, 2025.

An indictment charging Ms. Butts with eight counts of Health Care Fraud and eight counts of Wire Fraud, was issued in this case on June 25, 2024. (Doc. 1). The Court made a speedy trial finding at a counsel-only scheduling conference held on July 30, 2024, which excluded the 60 days between that hearing and the next, which was held on September 24, 2024. (Doc. 7). At the November 22, 2024, counsel-only scheduling conference, the parties appeared and conferred regarding the deadlines for motions, and the Court adopted the following scheduling order: defense motions were to be due January 17, 2025, the Government's response due by January 31, 2025, and defense reply briefs due by February 7, 2025. (Doc 10).

Due to the significant volume of discovery turned over to the defense, undersigned counsel requires additional time to review the materials to assist in drafting a motion. The discovery includes thousands of pages of records and potentially privileged documents and information that were turned over to the Government by Ms. Butts's prior counsel. As such, a privilege log must be compiled in preparation for pretrial motions, which is taking longer than expected. The relevant materials for undersigned counsel's motion include tax and bank records which are voluminous and time-consuming to review and analyze.

In advance of this motion, undersigned counsel contacted Assistant United States Attorney Carter Stewart to discuss a three-week extension. AUSA Stewart indicated that the Government does not object this motion.

For these reasons, undersigned counsel believes there is good cause to grant the motion for modification of the established scheduling order to the date listed above.

Dated this 14th day of January, 2025.

Respectfully submitted,

GIMBEL, REILLY, GUERIN & BROWN LLP

By: /s/ Nicole M. Masnica
NICOLE M. MASNICA
State Bar No. 1079819
Email: nmasnica@grgblaw.com
Attorney for Defendant

POST OFFICE ADDRESS:

330 East Kilbourn Avenue, Suite 1170
Milwaukee, Wisconsin 53202
Telephone: 414/271-1440